

# KAPLAN HECKER & FINK LLP

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July 18, 2021

## BY EMAIL

William R. Maguire, Esq.  
Marc A. Weinstein, Esq.  
Neil J. Oxford, Esq.  
Hughes Hubbard & Reed LLP  
One Battery Park Plaza  
New York, New York 10004

*Re: June 25, 2019 Subpoena to Maple Point LLC, In re Customs and Tax  
Administration of the Kingdom of Denmark (Skatteforvaltningen) Tax  
Refund Scheme Litigation, No. 18-md-2865 (S.D.N.Y.)*

Dear Messrs. Maguire, Weinstein, and Oxford:

Maple Point LLC ("Maple Point") has previously produced documents in the above-referenced action in response to a subpoena dated June 25, 2019 and issued to Maple Point on June 26, 2019 (the "Subpoena"). Subject to the general and specific objections to the Subpoena provided to you on July 3, 2019 by Maple Point's prior counsel at Wachtell, Lipton, Rosen & Katz, this letter and the enclosed materials (the "Production") are submitted in substantial completion of Maple Point's response to the Subpoena. The enclosed materials bear production Bates numbers MPSKAT00274807 through MPSKAT00275618.

Also enclosed please find a log identifying otherwise responsive documents that have been withheld from production or redacted on the basis of privilege.

The 99,934 documents that Maple Point has produced in response to the Subpoena were identified through an extensive search and review of documents that were located on the Maple Point email server or in the company's electronic files. Maple Point's search and review process was not applied to materials that were received from counsel for third parties, with the exception of certain limited, agreed-upon document categories previously discussed with you (e.g., copies of certain regulatory filings and legal invoices).

The Production is governed by the Revised Amended Stipulated Protective Order Governing Confidentiality of Discovery Materials ordered by the Court on November 6, 2020, and contains materials designated "Confidential" or "Highly Confidential" pursuant thereto. By making the Production, Maple Point does not intend to, and does not, waive the protections of the

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attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege or confidentiality protection with respect to the materials or information enclosed herewith or any other materials or information, and nothing in this letter is intended to waive any applicable privilege or protection available under any law, rule, or regulation.

Should you have any questions with respect to the Production, please do not hesitate to contact us.

Sincerely,



Marshall L. Miller

Enclosures (Electronic File Link; PDF Privilege Log)